

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

**CASE NO. 1:24-cv-24734-GAYLES**

<b>BRIGHTLINE TRAINS</b>	)	
<b>FLORIDA LLC,</b>	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
<b>NATIONAL MEDIATION BOARD,</b>	)	
	)	
Defendant.	)	
	)	

---

**TRANSPORT WORKERS UNION OF AMERICA’S UNOPPOSED MOTION FOR AN  
EXTENSION OF BRIEFING SCHEDULE, AND STATEMENT IN SUPPORT**

The Transport Workers Union of America, AFL-CIO (“TWU” or “Union”) hereby moves the Court for an extension of the briefing schedule on TWU’s opposition to Brightline Trains Florida, LLC’s (“Brightline FL” or “Company”) pending motion to dismiss and Brightline FL’s reply. TWU requests a one-week extension because the mother and grandmother of TWU’s counsel passed away on March 21, 2025 and TWU’s counsel was returning from the funeral on March 25<sup>th</sup> when Brightline FL’s motion to dismiss was filed.

TWU’s opposition to Brightline FL’s motion is currently due on April 8, 2025, the due date for Brightline FL’s reply in support of its motion is currently due April 15, 2025. TWU respectfully requests that the due date for its opposition brief be reset to April 15, 2025, and that the due date for Brightline FL’s reply brief be reset to April 29, 2025.

TWU’s counsel has discussed this motion with Brightline FL’s counsel who has authorized TWU’s counsel to represent that Brightline FL does not oppose this motion.

In view of the foregoing, TWU respectfully requests that this motion for an extension of the briefing schedule in this case be granted, that the due date for its opposition brief be reset to April 15, 2025, and that the due date for Brightline FL's reply brief be reset to April 29, 2025.

**CERTIFICATE OF GOOD FAITH CONFERENCE**

Pursuant to Local Rule 7.1(a)(2), I hereby certify that counsel for the movant has made reasonable efforts to confer with all parties and non-parties who may be affected by the relief sought in the motion, and Counsel for Brightline FL has represented that Brightline FL does not object to this motion.

Dated: March 31, 2025

Respectfully submitted,

/s/ Mark H. Richard

Mark H. Richard  
Florida Bar No. 305979  
Christina S. Gornail  
Florida Bar No. 085922  
PHILLIPS, RICHARD & RIND, P.A.  
9360 S.W. 72nd Street, Suite 283  
Miami, FL 33173  
Telephone: (305) 412-8322  
Facsimile: (305) 412-8299  
Email: mrichard@phillipsrichard.com  
Email: cgornail@phillipsrichard.com

Richard S. Edelman \*  
Aaron S. Edelman \*  
MOONEY, GREEN, SAINDON, MURPHY & WELCH  
1620 Eye Street, N.W., Suite 700  
Washington, D.C. 20006  
Telephone: (202) 783-0010  
Facsimile: (202) 783-6088  
Email: redelman@mooneygreen.com  
Email: aedelman@mooneygreen.com

*Attorneys for TWU*

\* Admitted Pro Hac Vice

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 31, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on Ellen Crisham Pellegrini, Esq. [epellegrini@sidley.com](mailto:epellegrini@sidley.com), Raymond Atkins, Esq., [ratkins@sidley.com](mailto:ratkins@sidley.com), Terence Hynes, Esq. [Thynes@sidley.com](mailto:Thynes@sidley.com), Lawrence Silverman, Esq. [Lawrence.silverman@sidley.com](mailto:Lawrence.silverman@sidley.com), Counsel for Plaintiff and Anthony Erickson-Pogorzelski, Esq. [Anthony.pogorzelski@usdoj.gov](mailto:Anthony.pogorzelski@usdoj.gov), Counsel for Defendants and other parties of record via Electronic Filing generated by CM/ECF.

/s/ Mark H. Richard

Mark H. Richard